

1 **DAVID G. BANES, ESQ.**  
2 **O'Connor Berman Dotts & Banes**  
3 **Second Floor, Marianas Business Plaza**  
4 **P.O. Box 501969**  
5 **Saipan, MP 96950-1969**  
6 **Telephone No. (670) 234-5684**  
7 **Facsimile No. (670) 234-5683**

8 *Attorneys for Plaintiff Hye Lin Shin*

9  
10 **IN THE UNITED STATES DISTRICT COURT**  
11 **FOR THE NORTHERN MARIANA ISLANDS**

12 **HYE LIN SHIN,**

13 **Plaintiff,**

14 **v.**

15 **YOU RIM CORPORATION,**

16 **Defendant.**

17 **CIVIL ACTION NO.: 08-0022**

18 **PLAINTIFF'S PRE-DISCOVERY**  
19 **DISCLOSURE STATEMENT**

20  
21 Plaintiff Hye Lin Shin, by counsel, submits the following disclosures pursuant to Federal  
22 Rule of Civil Procedure 26 (a) (1) and Local Rule 16.2CJ (d):

23 **Disclosures Pursuant to Rule 26(a)(1)(A)**  
24 **(Persons With Potentially Discoverable Information):**

25  
26 The following individuals are likely to have discoverable information of Plaintiff's  
27 damages, including but not limited to, payment of the full amount of the dishonored check, plus  
28 allowable damages under the law including, but not limited to prejudgment interest, bank  
charges, attorney's fees and treble damages. They can be contacted through the Law Firm of  
O'Connor Berman Dotts & Banes:

- Hye Lin Shin (Plaintiff)
- Scarlet Hyun Shin

- Mr. Cho, You Rim Corporation agent
- Kim, Ki Sup, You Rim Corporation president

Discovery into this matter is continuing. The individuals listed above may not constitute a complete listing of all names responsive to the disclosure requirement. Such information shall be forwarded to Defendant when it becomes available.

**Disclosures Pursuant to Rule 26(a)(1)(B) (Documents, Data and Tangible Things)**

- Bounced check
- Demand letter and certified mail receipt

As additional documents become available, they will be disclosed either by way of supplemental disclosures or discovery.

**Disclosures Pursuant to Rule 26(a)(1)(C) (Computation of Damages)**

Plaintiff claims the payment of the full amount of the dishonored check (\$190,000.00) plus all allowable damages under the law, including but not limited to prejudgment interest, bank charges, other allowable damages, attorney's fees and treble damages. Plaintiff also claims incidental, consequential, statutory and liquidated damages, including damages for emotional distress, punitive damages, interests, attorney fees and costs.

Plaintiff will supplement these disclosures if and when further information becomes available.

1 Dated: August 19, 2008.

2 O'CONNOR BERMAN DOTTS & BANES  
3 Attorneys for Plaintiff Hye Lin Shin

4  
5 By: /s/  
6 DAVID G. BANES  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

26 K:\David Banes\2542-11 HYE LIN SHIN\2542-11-080731-PIDiscoveryDisclosures.doc  
27  
28